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for communication & security

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: **Annual 47 C.F.R § 64.2009(c) CPNI Certification for 2007**
EB Docket No. 06-36

Form 499 Filer ID: 815272

CERTIFICATION

I, Jeff Billings, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R §§ 64.2001 *et seq.* of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and (iv) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.

Jeff Billings
Paging Division Manager
February 26, 2008

Corporate Office: 800 Megahertz Drive ■ Winston-Salem, NC 27107 ■ (336) 788-9191



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RCS Wireless Technology
800 Megahertz Dr
Winston Salem, NC 27107
Form 499 Filer ID: 815272

STATEMENT

RCS Wireless Technology has established operating procedures that ensure compliance with the Federal Communication Commissions ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI")

- RCS does not receive or record customer call detail; therefore no call detail information can be distributed to the customer.
- RCS educates and trains its employees regarding the appropriate use of its customers' CPNI. Third parties are not allowed access to CPNI.
- RCS does not sell or distribute CPNI to any marketing or sales firm for the purpose of marketing communications.
- RCS did not have any actions to file against data brokers in 2007.
- RCS has not recorded any instances where pretexters attempted to access CPNI.
- RCS has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at retail locations or otherwise and in connection with these procedures.
- RCS has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.



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- RCS did not receive or record any customer complaints regarding unauthorized release of CPNI during 2007.